UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :

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Anthony S. Bruttaniti : Case No.: 19-17707(MDC)

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Debtor(s) : Chapter 13

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC STAY FILED BY SPECIALIZED LOAN SERVICING, LLC et al

COMES NOW, Debtor, Anthony S. Bruttaniti, hereinafter referred to as "Debtor," by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Specialized Loan Servicing, LLC et al, "Movant", and hereby avers the following:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted
- 5. Admitted.
- 6. Admitted.
- 7. Admitted.
- 8. Admitted.
- 9. Admitted.
- 10. Denied. By way of further response, Debtor made three payments to creditor through bill pay as requested by mortgagee in January, February and March which were all returned.
- 11. Denied.

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12. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: May 14, 2020 /s/ Brad J. Sadek, Esq.

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